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Attorneys for Plaintiff
EMPRESS HOLDING LIMITED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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EMPRESS HOLDING LIMITED,

ECF CASE

Plaintiff,
- against -

08 Civ. 7135 (HB)

CLEVELAND POTASH LTD.,

Defendant.

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RULE 7.1 DISCLOSURE STATEMENT

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, Kirk M. Lyons, a member of the Bar of this Court and a partner with the firm of Lyons & Flood, LLP, attorneys for plaintiff EMPRESS HOLDING LIMITED, certifies upon information and belief that said plaintiff is not a publicly held corporation in the United States and that there are no corporate parents, subsidiaries, or affiliates of plaintiff which are otherwise publicly held in the United States.

Dated: August 11, 2008

LYONS & FLOOD, LLP
Attorneys for Plaintiff
EMPRESS HOLDING LIMITED

By:

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